



**BellSouth Telecommunications, Inc.**

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**Guy M. Hicks**  
General Counsel

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December 5, 2000

VIA HAND DELIVERY

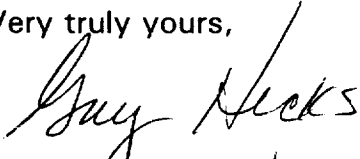

David Waddell, Executive Secretary  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37238

Re: *Complaint by AT&T Regarding the Delivery of Calling Name Services  
by BellSouth Telecommunications, Inc.*  
Docket No. 00-00971

Dear Mr. Waddell:

Enclosed are the original and thirteen copies of BellSouth's List of Proposed Issues. Copies of the enclosed are being provided to counsel of record for all parties.

Very truly yours,

  
Guy M. Hicks w/permission 

GMH:ch  
Enclosure

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POSTED  
12-6-00

The Commission has incorporated this definition into its rules, which set forth performance criteria that LECs must meet with regard to number portability. 47 C.F.R. § 52.23(a). Of particular relevance here, the Commission's rules specifically require BellSouth to provide number portability that supports network services, features, and capabilities existing at the time number portability is implemented, *including CLASS features such as caller ID*. *Id.* § 52.23(a)(1). As the Commission has recognized, CNAM is necessary to provide caller ID and other related telecommunications services. Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, 15 FCC Rcd 3696, ¶¶ 406, 416 (1999). BellSouth also must provide number portability that "does not result in any degradation in service quality or network reliability when customers switch carriers." 47 C.F.R. § 52.23(a)(5) (emphasis added). Absent compliance with such requirements, the Commission has concluded that competitive LECs will be at a competitive disadvantage because customers will not want to switch carriers "if they are required to forego services and features to which they have become accustomed." Telephone Number Portability, 11 FCC Rcd 8352, ¶ 49 (1996) ("Number Portability Order").<sup>1</sup>

As described above, BellSouth has failed to meet these requirements and has repeatedly failed to cure the deficiencies of its number portability functionalities, despite numerous promises to do so. BellSouth has long offered to implement what it has characterized as an interim solution, but this solution is discriminatory and inadequate. It would require a CLEC to modify its systems to download CNAM information for its customers using ported BellSouth numbers into BellSouth's CNAM database, thereby (1) giving BellSouth free access to that information, which could be used in an anticompetitive manner, (2) freeing BellSouth from the cost of dipping the appropriate database for the CNAM information (a cost that a CLEC that performs ten digit global title translations incurs when a BellSouth customer calls one of the CLEC's customers), and (3) requiring CLECs to incur the cost of downloading the CNAM information into the BellSouth database (again, a cost that BellSouth would not incur for CLECs that perform ten digit global title translations). In addition to being too costly and discriminatory to be viable, BellSouth's proposal did not remedy the problem with regard to numbers ported from carriers other than BellSouth. Under the interim proposal, when a CLEC customer with a number ported from another CLEC calls a BellSouth customer, the BellSouth switch would dip the CNAM database of the CLEC to whom the calling party's number was originally assigned. That CLEC's database would no longer contain CNAM information for the calling party. Thus, in this instance, the CNAM information would not appear on the called party's caller ID unit even if the BellSouth interim proposal is implemented. In short, the interim solution does not, and cannot, address the problem of BellSouth failing to deliver calling name for ported CLEC numbers.

As mentioned, BellSouth may finally have seriously committed to implementing the global title translations to support CNAM. But given its consistent pattern of failing to meet

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<sup>1</sup> The Commission has previously concluded that the provision of caller ID is in the public interest "because national availability of caller ID enables a multitude of services, efficiency gains, and additional choices for consumers." See Number Portability Order ¶ 49 n.146 (citations omitted).

previous commitments and the qualified nature of even its most recent commitment, the SECCA members have little basis for believing that BellSouth will keep to even the timetable it has suggested. BellSouth must therefore be ordered to upgrade its number portability capability so that it complies with all the FCC's performance criteria, including nondiscriminatory service quality for CLEC customers, and so that it supports CLASS features such as CNAM/caller ID. In particular BellSouth should be ordered to keep to a specific timetable for testing and implementation, and the implementation must be performed for all NPAs at the same time, rather than in sequential order. Based on the timetable set forth in the attachment to the October 3, 2000 BellSouth Letter, SECCA sees no reason why full implementation could not be completed by April 30, 2001.

**III. Inclusion Of This Matter On The Accelerated Docket Is Appropriate And Warranted.**

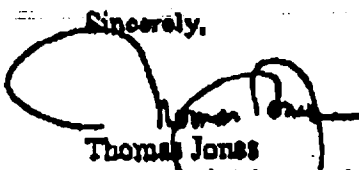
In section 1.730(e) of its rules, the FCC has identified several factors to be considered in determining whether to admit a proceeding onto the Accelerated Docket. SECCA believes that this matter meets the criteria specified in that rule:

- (i) Expedited resolution of this dispute would advance competition in the telecommunications market. By refusing to upgrade its number portability system, BellSouth erects a barrier to entry that effectively prohibits CLECs from competing for those BellSouth customers to whom it is important that their name appears on a call recipient's caller ID unit. As the Commission itself has recognized, customers will not switch to a CLEC's service if doing so requires that they "forego services and features to which they have become accustomed." Expedited resolution of this dispute is critical to the continued development of competition in BellSouth's region.
- (ii) This dispute is suited for resolution under the constraints of the Accelerated Docket because resolution of this dispute will involve straightforward application of the Act and the Commission's rules to facts not likely to be seriously in dispute.
- (iii) This dispute sets forth claims that are cognizable under the Act and within the FCC's jurisdiction. As discussed, this dispute involves the violation of Section 251(e)(2) and the Commission's rules.
- (iv) Inclusion in the Accelerated Docket would not be unfair to BellSouth. BellSouth is a major LEC with the resources to participate in an Accelerated Docket proceeding.

Mr. Alexander Starr  
November 20, 2000  
Page 6 of 6

Based on the foregoing, SECCA believes that consideration of this matter by the Commission under the Accelerated Docket is both warranted and appropriate. If you have any questions or concerns regarding this matter, please do not hesitate to call me.

Sincerely,



Thomas Jones  
Attorney for the Southeastern Competitive  
Carriers Association

cc: Frank Lamancusa, Deputy Division Chief,  
Market Disputes Resolution Division

**EXHIBIT**

**Bennett L. Ross**  
General Attorney

**BellSouth Telecommunications, Inc.**  
Legal Department - Suite 4000  
675 West Peachtree Street  
Atlanta, Georgia 30375-0001  
Telephone: 404-338-0783  
Facsimile: 404-338-0222

**October 3, 2000**

**Dana Shaffer, Esquire**  
XO Communications, Inc.  
105 Malloy Street, #100  
Nashville, TN 37201

**Carolyn Marek, Esquire**  
Time Warner Communications  
233 Bramerton Court  
Franklin, Tennessee 37068

**Susan Berlin, Esquire**  
MCI Worldcom, Inc.  
Six Concourse Pkwy. #3200  
Atlanta, GA 30328

**Re: CNAM Ten-Digit Global Title Translations Project**

**Dear Dana, Susan, and Carolyn:**

Consistent with our discussions on September 27, 2000, enclosed please find a timeline for the BellSouth CNAM Ten-Digit Global Title Translations Project. The timeline reflects the status of the work currently underway, and BellSouth intends to distribute an updated status report at the beginning of each month to keep your companies and the industry advised of the progress BellSouth is making in implementing Ten-Digit Global Title Translations across the BellSouth region.

There are three points that BellSouth would like to emphasize about the estimated completion dates reflected on the enclosed timeline. First, these estimates are based on BellSouth's best prediction of the time necessary to perform the work involved in this very complex undertaking given the other changes to the Service Transfer Points currently planned. BellSouth has not actually performed Global Title Translations on this scale in either the lab or the field, and BellSouth will have a much better idea of how long it will actually take to complete the work once the work is actually underway. In addition, BellSouth is evaluating various alternatives to expedite the translations process, which are not reflected in the enclosed timeline.

Dana Shaffer, Esquire  
Carolyn Marek, Esquire  
Susan Berlin, Esquire  
October 3, 2000  
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Second, the timeframes reflected in the timeline represent the total time from start to finish for a given group of NPA/NXXs. There will not be a flash cut at the end of the interval, but instead individual NPA/NXXs will be turned up throughout the time period. In other words, for example, even though BellSouth currently estimates that all of the NPA/NXXs in the first group will be completed by April 8, 2001, Ten-Digit Global Title Translations in NPA 801, which is currently the first NPA on the schedule, should be implemented well before that date.

Finally, BellSouth has devised this timeline to implement Ten-Digit Global Title Translations first in Tennessee, as it has previously committed to do. However, BellSouth is willing to modify the order of the NPAs within Tennessee and the other states based upon the consensus of the industry. On our last conference call, you agreed to provide BellSouth with input from the Southeastern Competitive Carriers Association ("SECCA") as to SECCA's views as to the states in which Ten-Digit Global Title Translations should be implemented first. We also would appreciate SECCA's thoughts on the prioritization of NPAs within each state. Once this input is received, BellSouth will attempt to adjust the timeline accordingly. With that said, it should be noted that the groupings of NPA/NXXs are based on the way BellSouth's Service Control Points (SCPs) store names, and splitting a grouping into multiple parts may increase the time involved in implementing this project.

However, BellSouth welcomes your thoughts and suggestions. As we indicated on our last call, BellSouth is committed to completing this project as expeditiously as possible and to keeping the industry informed as to BellSouth's progress. We very much want this to be a cooperative effort and are willing to participate in regular conference calls to ensure adequate communications between the companies that have an interest in this project.

In that regard, we have scheduled a conference call for October 8, 2000 at 10:00 a.m. EDT to discuss this project. BellSouth will make arrangements for the call-in number.

Dana Shaffer, Esquire  
Carolyn Merck, Esquire  
Susan Berlin, Esquire  
October 3, 2000  
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In the meantime, if you have any questions or need additional information,  
please do not hesitate to call Guy or me.

Very truly yours,

*Bennett L. Rose*  
Bennett L. Rose 

Enclosure

cc: Guy Hinks, Esquire  
Marcus Cathay  
George Grier

230808



**BelSouth CNAM  
Ten-Digit Global Title Translations (GTT)  
Project Timeline**

<u>Milestone</u>	<u>Completion Date</u>	<u>Status</u>
1. Development Complete - Service Management System (SMS)	10/31/00	On schedule
2. Development Complete - Service Control Point (SCP)	11/28/00	On schedule
3. Testing Complete - SMS	11/15/00	
4. System Release - SMS	11/16/00	
5. Testing Complete - SCP	01/27/01	
6. SCP Updates & GTT changes in Service Transfer Point (STP) made for NPAs 901, 931, 613, 423, 865, 731	04/06/01	
7. SCP Updates & GTT changes in STP made for NPAs 305, 561, 786, 934	05/04/01	
8. SCP Updates & GTT changes in STP made for NPAs 336, 704, 820, 910, 919, 903, 843, 864	06/22/01	
9. SCP Updates & GTT changes in STP made for NPAs 229, 404, 478, 678, 706, 770, 913	08/03/01	
10. SCP Updates & GTT changes in STP made for NPAs 202, 296, 324, 820, 334, 318, 337, 684, 220, 601, 623	10/12/01	
11. SCP Updates & GTT changes in STP made for NPAs 321, 352, 407, 904	11/02/01	
12. SCP Updates & GTT changes in STP made for NPAs 370, 601, 406, 889	11/23/01	

FEDERAL COMMUNICATIONS COMMISSION  
445 TWELFTH STREET, S.W.  
WASHINGTON, D.C. 20554

November 29, 2000

Via Facsimile and U.S. Mail

W. Whit Jordan  
BellSouth Corporation  
Suite 900  
1133 21<sup>st</sup> Street, N.W.  
Washington, D.C. 20036-3351  
FAX: 202/463-4198

Re: Potential Accelerated Docket Matter - Southeastern Competitive Carriers  
Association v. BellSouth Telecommunications, Inc.

Dear Whit:

Attached please find a request by Southeastern Competitive Carriers Association ("SECCA") for inclusion on the Commission's Accelerated Docket pursuant to 47 C.F.R. § 1.730 to resolve a dispute between SECCA and BellSouth Telecommunications, Inc. ("BellSouth"). Specifically, SECCA alleges that BellSouth has failed to upgrade its network to support ten digit global title translations for caller name identification. In accordance with the practices of the Accelerated Docket, the Commission requests that BellSouth respond in writing to the Commission and SECCA by 5:00 p.m., December 13, 2000.

If you have any questions related to this matter, please contact Anthony DeLaurentis of the Market Disputes Resolution Division at 202/418-0198.

Sincerely,



Frank G. Larnancusa  
Deputy Division Chief  
Market Disputes Resolution Division  
Enforcement Bureau

cc: Thomas Jones (w/o attachment)

### CERTIFICATE OF SERVICE

I hereby certify that on December 5, 2000, a copy of the foregoing document was served on the parties of record, via the method indicated:

- ☐ Hand
- ☒ Mail
- ☐ Facsimile
- ☐ Overnight

Gary L. Sharp  
AT&T  
414 Union Street, #1830  
Nashville, TN 37219

- ☐ Hand
- ☒ Mail
- ☐ Facsimile
- ☐ Overnight

Henry Walker, Esquire  
Boult, Cummings, et al.  
P. O. Box 198062  
Nashville, TN 37219-8062

- ☐ Hand
- ☒ Mail
- ☐ Facsimile
- ☐ Overnight

Charles B. Welch, Esquire  
Farris, Mathews, et al.  
618 Church Street, #300  
Nashville, TN 37219

Guy Hicks @cd.  
w/permission